

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF  
OKLAHOMA**

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

JEFFREY LOWE,

LAUREN LOWE,

GREATER WYNNEWOOD EXOTIC ANIMAL  
PARK, LLC, and

TIGER KING, LLC,

*Defendants.*

Case No. 6:20-cv-00423-JFH

**JOINT STATUS REPORT**

Pursuant to the Court's May 23, 2021 Order, the parties hereby submit this joint status report. Since the May 12, 2021 show cause hearing, the United States executed a warrant to remove a total of 63 animals—lions, tigers, lion-tiger hybrids, and a jaguar—from Tiger King Park. On May 28, 2021, the United States filed an application for damages. Dkt. 100. Defendants' response to the application is due on June 11, 2021.<sup>1</sup> On June 2, 2021, the U.S. Department of Agriculture's Animal and Plant Health Inspection Service conducted a routine inspection of Tiger King Park. The inspection report was timely sent to Defendants' counsel on June 9, 2021. On June 10, 2021, Defendants' counsel informed counsel for the United States that he intended to file another motion to withdraw as counsel. On June 11, 2021, the United States stated its opposition to counsel's motion to withdraw. The United States' response, if any, to the motion to withdraw is due June 25, 2021. The parties have no additional deadlines until the Court issues an order on the pending motion to dismiss.

---

<sup>1</sup> Counsel for the United States does not oppose a two-week extension of this deadline should Defendants' counsel seek an extension.

At the time of this filing, it is the United States' position that Defendants have not come into compliance with the Court's Orders. The Parties are actively engaging in discussions to determine if there is a potential for settlement. The United States intends to file a notice of noncompliance on June 18, 2021, and will request a hearing at the Court's convenience to discuss further sanctions, if the parties have not reached a tentative agreement regarding how to proceed with this litigation by that time.

DATED: June 11, 2021

Respectfully Submitted,

JEAN E. WILLIAMS  
Acting Assistant Attorney General  
Environment and Natural Resources Division

/s/ Mary Hollingsworth  
MARY HOLLINGSWORTH  
Senior Trial Attorney  
BRIENA STRIPPOLI  
Trial Attorney  
DEVON LEA FLANAGAN  
Trial Attorney  
United States Department of Justice  
Environment & Natural Resources Division  
Wildlife & Marine Resources Section  
P.O. Box 7611, Ben Franklin Station  
Washington, D.C. 20044-7611  
Mary.Hollingsworth@usdoj.gov | 202-598-1043  
Briena.Strippoli@usdoj.gov | 202-598-0412  
Fax: 202-305-0275

CHRISTOPHER J. WILSON  
Acting United States Attorney  
SUSAN BRANDON, Civil Chief  
United States Attorney's Office  
Eastern District of Oklahoma  
520 Denison Avenue  
Muskogee, OK 74401

*Attorneys for the United States of America*

/s/ Daniel J. Card (authorized on 06/11/2021)  
DANIEL J. CARD  
512 NW 12<sup>th</sup> Street

Oklahoma City, OK 73103  
580-465-4249  
dan@cardlawok.com

*Attorney for Defendants*